

Robert T. Mills (Arizona Bar #018853)
Sean A. Woods (Arizona Bar #028930)
MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
Telephone 480.999.4556
docket@millsandwoods.com
swoods@millsandwoods.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Susan Gellos, individually; Taryn Foster,
individually,

Plaintiffs

vs.

City of Phoenix, a governmental agency;
Christopher John Turiano and Jane Doe
Turiano, husband and wife; William Gates
and Jane Doe Gates, husband and wife;
Richard Lee Brunton and Jane Doe
Brunton, husband and wife; John and Jane
Does 1-X; ABC Corporations I-X; XYZ
Partnerships IX,

Defendants.

Case No.: CV-24-01529-PHX-GMS

**STIPULATION FOR EXTENSION
OF TIME TO RESPOND TO, AND
REPLY IN SUPPORT OF, MOTION
TO DISMISS**

(First Request)

(Assigned to the Honorable G. Murray
Snow)

Through undersigned counsel and pursuant to Rule 7.3 of the Local Rules of Civil Procedure, Plaintiffs and Defendants City of Phoenix, Christopher John Turiano, and William Gates (collectively, the “Phoenix Defendants”), hereby stipulate and agree to extend the deadlines for briefing related to the Phoenix Defendants’ Motion to Dismiss (Doc. 18). Specifically, the parties stipulate and agree to the following extended deadlines:

Plaintiffs shall file a Response to Phoenix Defendants’ Motion to Dismiss no later than **Monday, September 23, 2024**; and

Phoenix Defendants shall file a Reply in Support of their Motion to Dismiss no later than **Friday, October 11, 2024**.

The parties respectfully request that the Court extend the deadlines as set forth above based on the parties' counsels' scheduling conflicts and to allow the parties' counsel to discuss potential amendments to Plaintiffs' Complaint, which may resolve portions of Phoenix Defendants' Motion to Dismiss. Plaintiffs' counsel also just received notice of a medical emergency involving his mother that he must attend to immediately. This Stipulation is agreed to in good faith and not for purposes of delay.

A Proposed Order is filed concurrently herewith for the Court's convenience.

RESPECTFULLY SUBMITTED this 9th day of September 2024.

MILLS + WOODS LAW, PLLC

By /s/ Sean A. Woods
Robert T. Mills
Sean A. Woods
5055 North 12th Street, Suite 101
Phoenix, AZ 85014
Attorneys for Plaintiffs

**OFFICE OF THE PHOENIX CITY
ATTORNEY**

By /s/ Karen J. Stillwell (w/ permission)
Karen Johnson Stillwell
200 W Washington, Ste. 1300
Phoenix, Arizona 85003-1611
*Attorneys for Defendants City of Phoenix,
Officer Christopher Turiano, and Officer
William Gates*

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2024, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Karen Johnson Stillwell
karen.stillwell@phoenix.gov
OFFICE OF THE PHOENIX CITY ATTORNEY
law.civil.minute.entries@phoenix.gov
duvelsa.rios@phoenix.gov
200 W Washington, Ste. 1300
Phoenix, Arizona 85003-1611
*Attorneys for Defendants City of Phoenix,
Officer Christopher Turiano, and Officer
William Gates*

Robert B. Zelms
zelms@zelmserlich.com
Fatima Badreddine
fatima@zelmserlich.com
ZELMS ERLICH LENKOV & MACK
jrawlings@zelmserlich.com
ddrake@zelmserlich.com
5415 E High St., Ste. 425
Phoenix, Arizona 85054
Attorneys for Defendants Richard Lee Brunton and Jane Doe Brunton

/s/ Ben Dangerfield